

## FEDERAL ELECTION COMMISSION WASHINGTON, D.C. 20463

Mr. Marc E. Elias Perkins Coie 700 13th Street, NW Suite 600 Washington, DC 20005-3960

MAR 2 2 2016

RE:

MUR 6916

Respondents listed in Attachment A

Dear Mr. Elias:

On March 2, 2015, the Federal Election Commission notified your clients, the Respondents listed in Attachment A, of a complaint alleging violations of certain sections of the Federal Election Campaign Act of 1971, as amended. On March 15, 2016, the Commission found, on the basis of the information in the complaint, and information provided by multiple respondents, that there is no reason to believe the Respondents listed in Attachment A violated 52 U.S.C. §§ 30116, 30118, or 30119 by making or receiving prohibited in-kind contributions in the form of data and analytical tools and no reason to believe the Respondents listed in Attachment A violated 52 U.S.C. §§ 30116 or 30118 by making or receiving prohibited or excessive in-kind contributions in the form of coordinated communications. Accordingly, the Commission closed its file in this matter.

Documents related to the case will be placed on the public record within 30 days. See Statement of Policy Regarding Disclosure of Closed Enforcement and Related Files, 68 Fed. Reg. 70,426 (Dec. 18, 2003) and Statement of Policy Regarding Placing First General Counsel's Reports on the Public Record, 74 Fed. Reg. 66,132 (Dec. 14, 2009). The Factual and Legal Analysis, which explains the Commission's findings, is enclosed for your information.

If you have any questions, please contact Mcredith McCoy, the attorney assigned to this matter at (202) 694-1650.

Sincerely,

Peter G. Blumberg

Assistant General Counsel

Enclosures: Attachment A Factual and Legal Analysis

# FEDERAL ELECTION COMMISSION ATTACHMENT A

Democratic Congressional Campaign Committee and Kelly C. Ward in her official capacity as treasurer

A Whole Lot of People for Grijalva Congressional Committee and Maya Castillo in her official capacity as treasurer

Aaron Woolf for Congress and Sue Montgomery Corey in her official capacity as treasurer

Aimee Belgard for Congress and Sander Friedman in his official capacity as treasurer

Alex Sink for Congress and Jennifer May in her official capacity as treasurer

Americans for Gabriel Rothblatt and Taj Alice Jones Rothblatt in her official capacity as treasurer

Ami Bera for Congress and Jennifer May in her official capacity as treasurer

Anesa for Iowa and Eric Bearbower in his official capacity as treasurer

Ann Callis for Congress and Jennifer May in her official capacity as treasurer

Appel for Iowa, Inc. and Sally Pedersen in her official capacity as treasurer

Barbara Lee for Congress and Loraine Binion in her official capacity as treasurer

Beatty for Congress and Jeffrey A. Ruppert in his official capacity as treasurer

Becerra for Congress and Robert Herrera in his official capacity as treasurer

Beto O'Rourke for Congress Committee and Susannah Byrd in her official capacity as treasurer

Bill Foster for Congress and Aesook Byon in his official capacity as treasurer

Blumenauer for Congress and Henry Hewitt in his official capacity as treasurer

Bobby for Michigan and Daniel Pydyn in his official capacity as treasurer

Bonamici for Congress and Elise Greene in her official capacity as treasurer

Brad Ashford for Congress and Frank Barrett in his official capacity as treasurer

Brenda Lawrence for Congress and Lindsay Angerholzer in her official capacity as treasurer

Brian Higgins for Congress and Gary Kanaley in his official capacity as treasurer

Butterfield for Congress and Scott R. Falmlen in his official capacity as treasurer

Cannon for Congress and Jennifer May in her official capacity as treasurer

Carl Sciortino Committee and Francis Pemberton Brown in her official capacity as treasurer

Carol Shea-Porter for Congress and Mary Dimodica-Kulju in her official capacity as treasurer

Cartwright for Congress and Jennifer May in her official capacity as treasurer

Castor for Congress and Amy Diamond in her official capacity as treasurer

Cicilline Committee and Nancy L. Benoit in her official capacity as treasurer

Citizens for Michael Wager and Peggy Gries Wager in her official capacity as treasurer

Cohn for Congress and Bob Friedman in his official capacity as treasurer

Cole for Congress and Nicholas Fine in his official capacity as treasurer

Committee to Elect Gary L. Ackerman, Inc. and Robert Barnett in his official capacity as treasurer

Committee to Elect Leslie to Congress and Judy Pingel in her official capacity as treasurer

Committee to Elect Martha Robertson Enid Littman in her official capacity as treasurer

Committee to Re-Elect Henry "Hank" Johnson and Malcolm A. Cunningham in his official capacity as treasurer

Committee to Re-Elect Loretta Sanchez and Katharine Meyer Borst in her official capacity as treasurer

Committee to Re-Elect Nydia M. Velazquez and Betty Diana Arce in her official capacity as treasurer

Connolly for Congress and John Jennison in his official capacity as treasurer

Corry Westbrook for Congress and Catherine E. Wenzing in her official capacity as treasurer

Courtney for Congress and Tim Poloski in his official capacity as treasurer

Crowley for Congress and Scott G. Kaufman in his official capacity as treasurer

Dan Lipinski for Congress and Jerome R. Hurckes in his official capacity as treasurer

Debbie Dingell for Congress and Martha Darling in her official capacity as treasurer

Debbie Wasserman Schultz for Congress and Lawrence Wasserman in his official capacity as treasurer

Defazio for Congress and Jef A. Green in his official capacity as treasurer

Delbene for Congress and Jay Petterson in his official capacity as treasurer

Diana Degette for Congress and Edgar Neel in his official capacity as treasurer

Doggett for Congress and James E. Cousar in his official capacity as treasurer

Donald M. Payne Jr. for Congress and H. O'Neil Williams in his official capacity as treasurer

Donna Edwards for Congress and Janice Edwards in her official capacity as treasurer

Dr. Raul Ruiz for Congress and John Pinkney in his official capacity as treasurer

Duckworth for Congress and Keith D. Lowey in his official capacity as treasurer

Ebbin for Congress and Patsy Ticer in her official capacity as treasurer

Ed Jany for Congress and Jennifer May in her official capacity as treasurer

Ehrlich for Congress and Kirsten L. Koester in her official capacity as treasurer

Elizabeth Colbert Busch for Congress and Claus Busch in his official capacity as treasurer

Ellison for Congress and Carla Kjellberg in her official capacity as treasurer

Eloise Gomez Reyes for Congress and William P. Smith in his official capacity as treasurer

Enyart for Congress and Brent M. Gaines in his official capacity as treasurer

Erin Bilbray for Congress and William Stanley in his official capacity as treasurer

Erin McClelland for Congress and Douglas Campbell in his official capacity as treasurer

Euille for Congress and Lynnwood G. Campbell in his official capacity as treasurer

Fattah for Congress and Roger J. Jackson, Jr. in his official capacity as treasurer

Fausz for Congress and Jonathan Wheeler in his official capacity as treasurer

Frederica S. Wilson for Congress and Larry Handfield in his official capacity as treasurer

Friends for Gregory Meeks and Patsy A. Simmons in her official capacity as treasurer

Friends of Cheri Bustos and Jeanette Hunter in her official capacity as treasurer

Friends of Corrine Brown and Gloria Simmons in her official capacity as treasurer

Friends of Dan Kildee and Jeff Tippett in his official capacity as treasurer

Friends of Dan Maffei and Herbert Millane in his official capacity as treasurer

Friends of Don Beyer and Mary Margaret Whipple in her official capacity as treasurer

Friends of Farr and Sidney Slade in her official capacity as treasurer

Friends of John Barrow and Tom Bordeaux in his official capacity as treasurer

Friends of John Sarbanes and Meghan Stumpf in her official capacity as treasurer

Friends of Lois Capps and Andrew Siegel in his

Friends of John Delaney and April McClain Delaney in her official capacity as treasurer

Friends of Mark Sickles and Charles R. Chambers, Jr. in his official capacity as treasurer

Friends of Patrick Murphy and Brian Foucart in his official capacity as treasurer

Friends of Pete Gallego and Anthony Gutierrez in his official capacity as treasurer

Friends of Rosa Delauro and Patrick Charmel in his official capacity as treasurer

Friends of Shaughnessy Naughton and Erinn Larkin in her official capacity as treasurer

Friends of Tate Macqueen and Lori Murphy in her official capacity as treasurer

Friends of Val Arkoosh and Margaret Sager in her official capacity as treasurer

Gallego for Arizona and Rebecca Wininger in her official capacity as treasurer

Garamendi for Congress and Janica Kyriacopoulos in her official capacity as treasurer

Glen Gainer for Congress and Jennifer May in her official capacity as treasurer

Gloria Bromell Tinubu for Congress and Donald L. Fowler in his official capacity as treasurer

Greenstein for Congress and Jennifer May in her official capacity as treasurer

Hansen Clarke for Congress and Choi Palms-Cohen in her official capacity as treasurer

Himes for Congress and Kathleen
Digennaro Warner in her official capacity
as treasurer

Hope for Congress and Elizabeth L. Wildhack in her official capacity as treasurer

Horsford for Congress and Piper Overstreet in her official capacity as treasurer

Hoyer for Congress and Amy Pritchard in her official capacity as treasurer

Huffman for Congress 2014 and Stacy E. Owens in her official capacity as treasurer

Ikaika for Hawaii and Stacey Edralin in her official capacity as treasurer

Janice Hahn for Congress and James Cross official capacity as treasurer

Jeffries for Congress and Lenue H. Singletary III in his official capacity as treasurer

Joanne Dowdell for Congress and Joanne Dowdell in her official capacity as treasurer

Joe Garcia for Congress and Roland Sanchez-Medina in his official capacity as treasurer

Joe Kennedy for Congress and David N. Martin in his official capacity as treasurer

John Lewis for Congress and Michael Collins in his official capacity as treasurer

John Tierney for Congress and George Atkins in his official capacity as treasurer

Julia Brownley for Congress and Jennifer May in her official capacity as treasurer

Kaptur for Congress and Thomas Jaffee in his official capacity as treasurer

Karen Bass for Congress and Stephen J. Kaufman in his official capacity as treasurer

Katherine Clark for Congress and Gemma W. Martin in her official capacity as treasurer

Keep Nick Rahall in Congress Committee and Edward Rahall in his official capacity as treasurer

Kevin Strouse for Congress and Ronald L Fader in his official capacity as treasurer

Kind for Congress Committee and Brent Smith in his official capacity as treasurer

Kirkpatrick for Arizona and Daniel A. Flores in his

Korpe for Congress and Satish W. Korpe in his official capacity as treasurer

Kultala for Congress and Carol Marinovich in her official capacity as treasurer

Kurt Schrader for Congress and Jeff A. Green in his official capacity as treasurer

Kuster for Congress, Inc. and Charles Willing in his official capacity as treasurer

Kyrsten Sinema for Congress and Judith Allen in her official capacity as treasurer

Laferla for Congress and Frances Miller in her official capacity as treasurer

Langevin for Congress and Edward A. Giroux in his official capacity as treasurer

Lara for New Mexico and Jennifer May in her official capacity as treasurer

Larson for Congress and Barry Feldman in his official capacity as treasurer

Laura Fjeld for Congress Committee and Deborah Hylton in her official capacity as treasurer

Lenda Sherrell for Congress and Richard F. Laroche in his official capacity as treasurer

Loebsack for Congress and Ian J. Russell in his official capacity as treasurer

Lofgren for Congress and Mark B. Fredkin in his official capacity as treasurer

Lois Frankel for Congress and Janica Kyriacopoulos in her official capacity as treasurer

Lopez for Congress and Amy Lewis in her official capacity as treasurer

Louise Slaughter Re-Election Committee and Nora E. Tuthill in her official capacity as treasurer

Lucille Roybal-Allard for Congress and A. Christian Hart in his official capacity as treasurer

Malcolm Graham for Congress and Donnie T. Simmons in his official capacity as treasurer

Maloney for Congress and Melissa A. Mendez in her official capacity as treasurer

Marc Veasey Congressional Campaign Committee and Charles G. Langham, III in his official capacity as treasurer

Margie Wakefield for Congress and Doni Mooberry Slough in his official capacity as treasurer

Marjorie 2014 and Jennifer May in her official capacity as treasurer

Mark Pocan for Congress and Sondy Pope in her official capacity as treasurer

Mark Takai for Congress and Edward Dion Kaimihana in his official capacity as treasurer

Mark Takano for Congress and Jennifer May in her official capacity as treasurer

Martin Skelly for Congress and Kelly Skelly in her official capacity as treasurer

Mary Rose Wilcox for Congress and Aaron Kizer in his official capacity as treasurer

Matsui for Congress and David K. Murphy in his official capacity as treasurer

McAffrey for Congress and John David Stinson in his official capacity as treasurer

McCollum for Congress and Mary Pat Lee in her official capacity as treasurer

Mike Honda for Congress and Vicki Day in her official capacity as treasurer

Mike Thompson for Congress and Tom Hannigan in his official capacity as treasurer

Monica Vernon for Congress and Robert Rush in his official capacity as treasurer

Mowrer for Iowa and Dennis Skinner in his official capacity as treasurer

Nadler for Congress and Lewis Weissman in his official capacity as treasurer

Nancy Pelosi for Congress and Steven Swig in his official capacity as treasurer

Nick Casey for Congress and Martin Glasser in his official capacity as treasurer

Nita Lowey for Congress and Richard Melnikoff in his official capacity as treasurer

Nolan for Congress Volunteer Committee and James A. Dechaine in his official capacity as treasurer

Norm Mosher for Congress and Samantha Carol Van Saun in her official capacity as treasurer

Obermueller for Congress and Joanne Obermueller in her official capacity as treasurer

O'Brien for Iowa and H. Daniel Holm Jr. in his official capacity as treasurer

Pam Byrnes for Congress and Vicki Hopper in her official capacity as treasurer

Parrish for Congress and William F. Schoell in his official capacity as treasurer

Pascrell for Congress and Bernadette McPherson in her official capacity as treasurer Pat Murphy for Iowa and Vicki Krug in her official capacity as treasurer

Patrick Henry Hays for Congress and Mike Hays in his official capacity as treasurer

Paul Tonko for Congress and Patrick J. Bulgaro in his official capacity as treasurer

People for Ben and Carmen Lujan in her official capacity as treasurer

People for Derek Kilmer and Jay Petterson in his official capacity as treasurer

Perlmutter for Congress and Karen J. Rokala in her official capacity as treasurer

Pete Aguilar for Congress and Jennifer May in her official capacity as treasurer

Peter Clemens for Congress and Tammy
Clemens in her official capacity as treasurer

Pingree for Congress and Anne Rand in her official capacity as treasurer

Quigley for Congress and Erica Kelly in her official capacity as treasurer

Rangel for Congress and David A. Paterson in his official capacity as treasurer

Re-Elect McGovern Committee and William T. Talcott in his official capacity as treasurer

Richmond for Congress and Maple Gaines in her official capacity as treasurer

Rob Zerban for Congress 2014 and Randy Bryce in his official capacity as treasurer

Robin Kelly for Congress and Ryan Vanmeter in his official capacity as treasurer

Robles for Congress and Silvia Castro in her official capacity as treasurer

Romanoff for Congress and Michael Hamrick in his official capacity as treasurer

Ron Barber for Congress and Laura T. Almquist in her official capacity as treasurer

Ruben Hinojosa for Congress and Vickie Winpisinger in her official capacity as treasurer

Sanford Bishop for Congress and Evelyn Turner Pugh in her official capacity as treasurer

Scott Peters for Congress and Nicholas R. Femia in his official capacity as treasurer

Schertzing for Congress and Mary Ruttan in her official capacity as treasurer

Schiff for Congress and Stephen Kaufman in his official capacity as treasurer

Schneider for Congress and Mark A. Levy in his official capacity as treasurer

Sean Eldridge for Congress and Michael Oates in his official capacity as treasurer

Sean Patrick Maloney for Congress and Holly Giarraputo in her official capacity as treasurer

Sherman for Congress and Stephen J. Kaufman in his official capacity as treasurer

Sinner for Congress and Jon Ewen in his official

Steve Cohen for Congress and Henry M. Turley in his official capacity as treasurer

Steve Israel for Congress Committee and Harris Wiener in his official capacity as treasurer

Stephen Lynch for Congress and Brian Miller in his official capacity as treasurer

Swati Dandekar for Congress and Dennis J. Naughton in his official capacity as treasurer

Suzanne Patrick for Congress and Suzanne Patrick in her official capacity as treasurer

Swalwell for Congress and Shannon Fuller in her official capacity as treasurer

Ted Deutch for Congress Committee and Jeffrey Weinstock in his official capacity as treasurer

Terri Sewell for Congress and Edward A. Hosp in his official capacity as treasurer

Texans for Henry Cuellar Congressional Campaign and Rosendo Carranco in his official capacity as treasurer

Tim Bishop for Congress and Molly Bishop in her official capacity as treasurer

Tim Ryan for Congress and Allen Ryan in his official capacity as treasurer

Tim Walz for US Congress and Gerald Maschka in his official capacity as treasurer

Titus for Congress and Jennifer May in her official capacity as treasurer

Tulsi for Hawai'i and Talia Tamayo Khurana in her official capacity as treasurer

Van Hollen for Congress and Stacey Maud in her official capacity as treasurer

Vanderstelt for Congress and Deanna Taylor in her official capacity as treasurer

Walrond for Congress and Torian J. Robinson in his official capacity as treasurer

Welch for Congress and John C. Candon in his official capacity as treasurer

Wendy Greuel for Congress and Stephen J. Kaufman in his official capacity as treasurer

Yarmuth for Congress and Sarah J. Martin in her official capacity as treasurer